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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Rm. 7206
Hearing Date: Friday, October 18, 2019
Hearing Time: 9:30 a.m.
Response Date: Time of Hearing

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT, LLC,

Debtor.
Debtor.

Case No. 16-11767-CMA

RESPONSE TO OBJECTION ON
BEHALF OF ROSS HANSEN TO
MOTION TO APPROVE SETTLEMENT

Mark Calvert, Chapter 11 Trustee of Northwest Territorial Mint, LLC (the "NWTM Trustee") responds to the objection (the "Objection") Ross Hansen ("Hansen") to his Motion to Approve Settlement with Bradley Cohen and Cohen Asset Management, Inc. and Kathryn A. Ellis and to Authorize Sale of Seized Property (the "Motion") as follows:

Hansen objects to the proposed sale as he assert several items which were seized by the King County Sheriff belong to him. The items which he assert belong to him (the "Alleged Hansen Property") are the following:

#	Lot	Description	Weight	Quantity	Price
2	1&2	Bag Silver Bars/Copper Rounds	7.1 LBS	1	\$800.00
3	1&2	Bag Wheat Pennies 50 Face worth 2.5 Cents Each	34 LBS	1	\$112.50
4	1&2	Apple Ipad Pro	2.78 LBS	1	N/A
10	3&4	Small Cardboard Box of Misc Coins, Bars and Knives	4.06 LBS	1	\$260.00
12	3&4	Red Box with Misc Medals and Tokens	8.87 LBS	1	\$1,150.00

1		Bag of Misc Token Medals -			
2	48	5&6 Mostly Non Precious	1	\$235.00	
3	49	5&6 Box Lot Misc Medals, Belt	1	\$75.00	
4	50	5&6 Buckle, Hobo Nickel			
5		Box Lot British Cap			
6		Insignia, Military & School			
7		Medals	1	\$300.00	
8		Assortment of Spoons			
9	51	5&6 Medals, Money Clips, ID	4.05		
10		Tags	LBS	1	\$75.00
11	52	7&8 Dell Desktop Computer and			
12		Monitor	1	N/A	
13	57	10 Small Box Medals - Lapel	1	\$75.00	
14		Pins			
15	77	13 Lot Misc Coins, Medals and	1	\$210.00	
16		Tokens			
17	78	14- Files and Papers - N/A for			
18		evaluation		N/A	
19	83	17 Misc Medals	4	\$1.25	

Of these items, nos. 4, 52, and 78 are not part of the proposed sale. The files and papers were turned over to Hansen in early 2019.

As is detailed in the Motion, these items were seized by the King County Sheriff in an execution related to a judgment against Hansen in favor of Bradley Cohen and Cohen Asset Management, Inc. (the "Cohen Parties"). The Seized Property, as defined in the Motion, was turned over to the NWTM Trustee pending a determination as to whether it belonged to the NWTM estate, Diane Erdmann, or Hansen. The Settlement was reached to resolve this very issue.

Hansen now asserts that the Alleged Hansen property is exempt from execution under RCW 6.15.010. He does not specify under which of the subsections of RCW 6.15.010 he is asserting the exemption, however the only applicable subsection appears to be RCW 6.15.010(1)(d)(ii), which provides an exemption of up to \$3,000 in miscellaneous personal property.

Setting aside any issues regarding whether Hansen really owns the Alleged Hansen Property, and whether the value exceeds the statutory exemption amount, the NWTM Trustee and Erdmann Trustee will agree to pull the Alleged Hansen property from the proposed sale. Neither the NWTM

1 Trustee or the Erdmann Trustee can consent to turning over the Alleged Hansen Property to Hansen,
2 given that the Alleged Hansen Property was seized in enforcement of the Cohen Judgment. The
3 NWTM Trustee has reached out to the attorney for the Cohen Parties seeking their agreement to turn
4 over Alleged Hansen Property in a value not to exceed \$3,000 to Hansen, but at the time of writing
5 has received no response.

6 The NWTM Trustee proposes that the Court enter an order approving the Settlement, and
7 authorizing the liquidation of the Seized Property, less the Alleged Hansen Property. The NWTM
8 Trustee further requests that the Court order that subject to agreement of the Cohen Parties, the
9 Alleged Hansen Property be turned over to Hansen, through his counsel, or, absent the consent of the
10 Cohen Parties, it be turned over to the King County Sheriff so that Hansen can claim his state law
11 exemptions.

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14 DATED this 17th day of October, 2019

15 K&L GATES LLP

16
17 By /s/ David C. Neu
18 Michael J. Gearin, WSBA #20982
19 David C. Neu, WSBA #33143
20 Brian T. Peterson, WSBA #42088
21 Attorneys for Mark Calvert, Chapter 11 Trustee
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That she is a paralegal in the law firm of K&L Gates LLP, and on October 17, 2019, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

7 Executed on the 17th day of October, 2019 at Seattle, Washington.

8 /s/ Denise A. Lentz
 9 Denise A. Lentz